

## UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS

BROWNSVILLE DIVISION

United States District Court  
Southern District of Texas  
JUL 05 2016

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

V

CRIMINAL COMPLAINT

MARTINEZ, SANDRA  
A209 230 377  
UNITED STATES

CASE NUMBER: B-16- 657 -MJ

I, the undersigned being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about 07/03/2016 in Cameron County, in the SOUTHERN District of TEXAS defendant, did,

encouraged or induced an alien to come to, enter, or reside in the United States knowing or in reckless disregard of the fact that such alien has not received prior authorization to come to, enter, or reside in the United States and done for the purpose of commercial advantage or private financial gain,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(iv),

in violation of Title 8 United States Code, Section(s) 1324(a)(2)(B)(ii).

I further state that I am a(n) Customs and Border Protection Officer and that this complaint is based on the following facts:

The defendant attempted to smuggle into the United States, a 12YOA undocumented alien by guiding her thru primary inspection at the pedestrian lane at Brownsville & Matamoros International Bridge in Brownsville, TX. The defendant presented a copy of a Texas birth certificate in the name of D [REDACTED] L [REDACTED] V [REDACTED] and further represented the child as her daughter to a U.S. Customs and Border Protection Officer. In secondary, the defendant admitted that she had instructed the child on the information on the birth certificate presented. The undocumented alien was identified as M.G.M.T. and determined by Customs and Border Protection Officers to be a citizen and national of Mexico by birth with no documents to enter and/or reside in the United States. Further, the defendant was to transport the child to Houston Texas to the mother of the child and was to be compensated \$2,500 US Dollars for her efforts.

Continued on the attached sheet and made a part hereof: Yes X No

IVAN E LEIJA CBPEO

Signature of Complainant

Sworn to before me and subscribed in my presence,

July 5, 2016

Date

at

Brownsville, Texas

City and State

RONALD G. MORGAN, U.S. MAGISTRATE JUDGE

Name &amp; Title of Judicial Officer

Signature of Judicial Officer